

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

x

Case No.: 4:20-cv-1186-JAR

TIMOTHY MILES, on behalf of himself and others similarly situated, :

Plaintiff, :

vs. :

MEDICREDIT, INC., :

Defendant. :

x

NOTICE OF CLASS ACTION SETTLEMENT

Timothy Miles and Medicredit, Inc. (the “Parties”) jointly notify this Court that they have reached an agreement to resolve this matter on a class-wide basis. To that end, the Parties respectfully request that this Court provide them thirty days (i) to additionally memorialize the terms of their settlement agreement, (ii) to establish a class action notice and administration plan, and (iii) for Mr. Miles, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, to file his unopposed motion for preliminary approval of the class action settlement.

WHEREFORE, the Parties respectfully request that this Court provide them thirty days—until August 12, 2022—to finalize their class action settlement agreement and for Mr. Miles to file his unopposed motion for preliminary approval of the class action settlement.

Respectfully submitted,

Dated: July 13, 2022

/s/ Michael L. Greenwald

Michael L. Greenwald (*pro hac vice*)
GREENWALD DAVIDSON RADBIL PLLC
5550 Glades Road, Suite 500
Boca Raton, FL 33431

Tel: (561) 826-5477
mgreenwald@gdrlawfirm.com

Anthony LaCroix
LaCROIX LAW FIRM, LLC
1600 Genessee, Suite 956
Kansas City, MO 64102
Tel: (816) 399-4380
Tony@lacroixlawkc.com

Counsel for Plaintiff and the proposed class

/s/ Megan D. Meadows
Scott J. Dickenson, #50478MO
Megan D. Meadows, #60669MO
SPENCER FANE LLP
1 N. Brentwood Blvd., Suite 1000
St. Louis, MO 63105
Tel: (314) 863-7733
sdickenson@gdrlawfirm.com
mmeadows@spencerfane.com

Maura K. Monaghan (*pro hac vice*)
Jacob W. Stahl (*pro hac vice*)
DEBEVOISE & PLIMPTON LLP
919 Third Ave.
New York, NY 10022
Tel: (212) 909-6000
mkmonaghan@debevoise.com
jwstahl@debevoise.com

Counsel for Defendant